



My family and I fishing in Bristol Bay's Egegik District

Acting Administrator Robert Perciasepe
Office of Environmental Information
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW (28221T)
Washington, DC 20460
ORD.Docket@epa.gov
Re: Docket #EPA-HQ-ORD-2013-0189

June 30, 2013

Re: Comments on Docket #EPA-HQ-ORD-2013-0189, "An Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska (Second External Review Draft)," U.S. Environmental Protection Agency, Washington, DC, April 2013

Dear Acting Administrator Perciasepe,

My name is Verner and I was born and raised in Dillingham, have been a Bristol Bay salmon fisherman my entire life along with members of my family, am a Bristol Bay Native Corporation shareholder, Curyung Tribal member and Program Officer for the World Wildlife Fund campaigning to protect Bristol Bay. I am writing you supporting the revised Bristol Bay Assessment, and supporting the EPA to immediately take further actions to protect Bristol Bay after the Assessment is complete. The pictures above are with my father and brother fishing our commercial fishing boat, the F/V Helena Rene in Bristol Bay. Salmon and other wildlife in Bristol Bay are not just important for me for commercial reasons, but also for subsistence reasons. This is the case for my friends and family from throughout Bristol Bay. I am 27 years old and want to be able to go subsistence hunting and fishing in Bristol Bay well into the future, just like my ancestors. I obtained an Environmental Studies Bachelor's degree from Brown University, where I completed a thesis titled "Indigenous Empowerment: the proposed Pebble Mine and Environmental Justice in Bristol Bay, Alaska" where I found that environmental compliance by mining companies has been challenging in many cases and that wild salmon runs have failed around the world due to a number of factors such as habitat destruction from mining (thesis at <http://envstudies.brown.edu/theses/archive20072008/VernerWilsonThesis.pdf>). I am going to graduate school at Yale University to get my Masters of Environmental Management,

so that I can have a better understanding of sustainable fisheries and environmental management. I am very concerned about proposed mining in Bristol Bay and want to thank the EPA for taking the leadership to understand the important science behind potential large scale mining in my home-region. The State of Alaska has not taken such leadership and unfortunately they have not tried to assess the impacts of mining to our fisheries. As a result, I have been involved with the Bristol Bay Assessment process, and talked with hundreds of my friends and family in Bristol Bay on mining issues in our region. Below I point out some strengths of the assessment, some recommendations and other considerations.

Assessment Strengths

As noted in EPA's second draft Assessment, Bristol Bay's sockeye salmon runs account for nearly half of the world's wild sockeye population. The bay is also home to a myriad of other wildlife species. As the EPA shows, the Bristol Bay watershed is home to over 190 species of birds, 29 species of fish and over 40 terrestrial mammals, all which have a role in the diverse and productive ecosystem. This is a very interesting analysis and shows the global importance of our salmon fishery.

The revised assessment shows that there could be many additional mines in the region that can cause even more habitat destruction. Also, it looked at multiple scenarios for Pebble Mine. It is important to show the cumulative impacts that a large mine at Pebble as well as additional mines can impact the fishery.

EPA responded to the Peer Reviewed Report and revised the Bristol Bay Watershed Assessment to include science data as part of a comprehensive risk assessment that underscores that large scale mining, would "at a minimum cause the loss of spawning and rearing habitat for multiple salmonids" (ES-i) and even with no incidents of catastrophic failure, large scale mining would – block streams with roads and development, reduce water flow in the region, directly eliminate up to 4800 acres of wetlands, and directly eliminate up to 90 miles of streams, and dewater an additional 33 miles of stream that are important habitat for multiple fish and wildlife species. This is an unacceptable adverse impact to the fishery, and it is highly suspect that Pebble could mitigate such impacts to help protect the fishery and wildlife. Salmon fisheries throughout the world, as well as the U.S., are stressed. It is up to EPA to protect the remaining stocks such as a stronghold like Bristol Bay.

Recommendations

I would suggest that the EPA look at current status of U.S. salmon is testament to the billions spent on mitigation efforts. If Pebble says that they can mitigate damages to fisheries and wildlife, how much would that cost? And would the mining companies be solely responsible for the costs? I would like to see a breakdown of how much it could potentially cost taxpayers and others for mitigation measures. I would also like to see how much it could potentially cost taxpayers to pay for maintenance well in the future after all the minerals are mined out. How much will this cost the State of Alaska? How much the federal government?

Expand the Assessment to include a mining scenario based solely on an underground mine at the Pebble East deposit. EPA should include the potential effects of this underground mine, since some stakeholders have indicated that Pebble may initially just apply for an underground mine

plan. The analysis should also assess a larger mine plan than the current largest scenario in the final Assessment, to include mining at the full scale of the deposit.

While the Pebble Partnership, in their baseline scientific documents claim that the Lake Clark Fault Line near the Pebble Prospect is currently inactive, I would like to point out the many strong earthquakes that have occurred where they were previously thought to be of low-risk, and where fault-lines were thought to have been inactive. According to the Washington Post's March 2012 story (at http://www.washingtonpost.com/national/health-science/seismic-hazards-japan-earthquake-and-other-tectonic-surprises-challenge-scientific-assumptions/2012/03/09/gIQAoV291R_story_1.html) there are a number of prominent seismologists and geophysicists that note how strong devastating earthquakes, such as the 2008 earthquake in China's Sichuan Province and 2004's Indian Ocean earthquakes, were not necessarily thought to have been in high earthquake prone-areas. If there was to be a strong earthquake at the Pebble Mine area which Pebble claims to be of low-risk at this point, it could potentially have catastrophic consequences for the mine infrastructure and thus fisheries, wildlife and indigenous cultures.

Include an assessment of recent king salmon stock concerns in Western Alaska. The Nushagak River was the only major western Alaska River in 2012 that met its king salmon escapement goal. Other traditional king salmon strongholds, including the Yukon and Kuskokwim Rivers, did not meet their king salmon escapement goals. There is scientific agreement that king salmon stocks throughout Alaska have been in decline for the past few years, so it is important for the EPA to include the fact that king salmon runs are being stressed throughout Alaska by something other than large-scale mining in the Bristol Bay region. Large-scale mining in the region can further exacerbate and stress Bristol Bay's king salmon populations.

Consider the ongoing National Marine Fisheries Service study of the potential mining impacts on freshwater seals of Lake Iliamna in the final Watershed Assessment. This study will help guide future EPA actions. These seals are currently under review by the National Oceanic and Atmospheric Administration for potential listing as a protected species under the Endangered Species Act. These marine mammals are an important part of the Bristol Bay ecosystem, as well as for Alaska Native cultures for subsistence purposes. The 404(b) (1) Guidelines of the Clean Water Act prohibit the authorization of discharges where they would jeopardize the continued existence of an endangered or threatened species or destroy or adversely modify its designated critical habitat. These same provisions should be considered for the endangered Cook Inlet beluga whales which could be adversely impacted by Pebble's potential infrastructure and activities in Cook Inlet.

Finally, it's important for regulators to understand the potential human health impacts for Alaska Natives and other residents of the region. This includes potential mining impacts on municipal water supplies and fisheries that people depend on for food. Since wild salmon is considered by many nutritionists as a "superfood" that is full of heart-healthy omega-3s and a great source of protein, it's important to understand how this would affect the health and wellbeing of people in the region and consumers worldwide. For example, if the mining company has an accident and damages the salmon runs, the Food and Drug Administration may have to issue warnings for people to not eat as much salmon from the Bristol Bay watersheds. Therefore it is important to

understand the risks that mining could bring to human health and both the current integrity and marketing of wild Alaska salmon.

Other Considerations and Conclusion

Many tribes formally petitioned the EPA to use your authority under the Clean Water Act to protect the waters for Bristol Bay from placing any dredge or fill into wetlands and water; and other village corporations, tribes, sportsmen, and commercial fishermen have requested that the EPA come in and protect Bristol Bay waters from large scale mining development. It is my belief that many tribes and residents of Bristol Bay support the findings of the revised Assessment, and for the EPA to finalize the revised Bristol Bay Watershed Assessment in 2013. I would know because I was involved in trips to Bristol Bay to urge others to comment on the assessment.

Once you have completed the Assessment in 2013, I support the EPA to immediately use your authority under section 404(c) of the Clean Water Act to prohibit large scale mining activities in the Bristol Bay region that will have an unacceptable adverse impact in Bristol Bay's fisheries and wildlife as shown in the revised Bristol Bay Assessment. Pebble Mine and other potential mines in the region will have unacceptable adverse effect on municipal water supplies, shellfish beds and fishery areas (including spawning and breeding areas), wildlife, or recreational areas.

Thank you for considering these comments.

Sincerely,
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